

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

NATIONAL CREDIT UNION
ADMINISTRATION BOARD, as Liquidating
Agent of Southwest Corporate Federal Credit
Union and Members United Corporate Federal
Credit Union,

Plaintiff,

v.

MORGAN STANLEY & CO., INC. AND
MORGAN STANLEY CAPITAL I INC.,

Defendants.

Case No. 13-cv-6705 (DLC)

SETTLING PARTIES' JOINT MOTION FOR A BAR ORDER

Plaintiff National Credit Union Administration Board, as liquidating agent (“NCUA”), and Defendants Morgan Stanley & Co., Inc., Morgan Stanley ABS Capital I Inc., Morgan Stanley Capital I Inc., and Saxon Asset Securities Company (“Morgan Stanley”; together with NCUA, the “Settling Parties”) respectfully move for the entry of a contribution bar order barring claims by other defendants and other alleged tortfeasors against Morgan Stanley & Co., Inc. and Saxon Asset Securities Company for contribution or indemnity in connection with two residential mortgage-backed securities Certificates at issue in *NCUA v. Morgan Stanley & Co., Inc.*, No. 13-cv-2418 (D. Kan.). The Settling Parties incorporate their memorandum in support as if fully stated herein.

Dated: January 6, 2016

/s/ David C. Frederick

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* Pursuant to this Court's ECF Rule 8.5(b), counsel for NCUA represents that counsel for Morgan Stanley has consented to the placement of his electronic signature on this document.

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